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December 14, 2021

VIA ONLINE FOIA REQUEST SYSTEM

Regional Freedom of Information Officer
U.S. EPA, Region 2
290 Broadway, 26th Floor
New York, NY 10007-1866
(212) 637-3668

Re: FOIA Request: Documents Relating to Previous FOIA Responses
by the Agency at the Grumman Aerospace MFG Plant

Dear Records Access Officer,

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, as amended by Public Law No. 104-231, 110 Stat. 3048, we hereby request all documents and communications relating to previous FOIA requests made to the Environmental Protection Agency ("EPA") within the time period January 1, 2020 through the present by Lilia Factor, Esq. or anyone else associated with the law firm Napoli Shkolnik PLLC concerning the Grumman Aerospace MFG Plant, located at S Oyster Bay RD, Bethpage, NY 11714 (the "Facility"). Specifically, we request documents including but not limited to:

- (1) All requests for documents made to the EPA by Lilia Factor, Esq. or anyone else associated with the law firm Napoli Shkolnik PLLC with respect to the Facility within the above time period, including all communications between the Agency and third parties related to such requests; and
- (2) All documents, communications, or other information produced in response to such requests.

We respectfully request that responsive documents be provided electronically to Dane Warren at dwarren@sprlaw.com and to Mark Chertok at mchertok@sprlaw.com. We are willing to pay the applicable fees for this request, including all photocopying and scanning expenses. If you are unable to provide an electronic copy of the requested documents, we request the opportunity to inspect them at your earliest convenience.

Thank you for your assistance in this matter. If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Dane Warren

Dane Warren